

REMARKS

In paragraph 4 of the final rejection, it is indicated that the 5x5 filter is calculated using information obtained due to the prior calculation of the 3x3 filter. The Examiner then concludes that "therefore, the calculation of the 5x5 filter must take place some moment after the 3x3 filter calculation because the 3x3 calculation is referred to as prior. The Examiner contends that this is in direct contradiction of the conventional definition of simultaneous, which is taken to mean occurring at the same time.

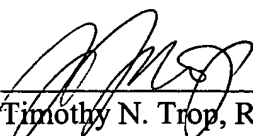
But the calculation of the 5x5 filter does take place at the same time as the calculation of the 3x3 filter because the calculation of the 3x3 filter is part of the calculation of the 5x5 filter. Therefore, the 3x3 and 5x5, by the Examiner's own definition, are necessarily undertaken simultaneously. Reconsideration of the rejection under Section 112 is respectfully requested.

Likewise, there is simply no basis for the rejection under Section 102 based on Park. As best it can be understood, it is argued that Park inherently does what is claimed. But there is no reason that Park inherently calculates the filters in the fashion claimed, namely simultaneously. See M.P.E.P. § 2112 (the allegedly inherent characteristic must necessarily flow from the teachings of the prior art). He could do them totally separately and serially. There is no reason to presume that he overlapped the calculations in the way claimed. Therefore, Park's teaching cannot meet the claims inherently since there is nothing whatsoever in Park that suggests that the filters are calculated simultaneously, and there is no reason why this must necessarily be so.

Therefore, reconsideration is respectfully requested.

Respectfully submitted,

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